

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CITY OF CHICAGO, an Illinois municipal corporation, Plaintiff, v. GLOCK, INC., Defendant.	Case No. 24 cv 03088 Hon. Steven C. Seeger
--	---

**AGREED MOTION FOR FILING OF MEMORANDA
IN EXCESS OF PAGE LIMITS**

Defendant Glock, Inc., by its undersigned counsel, hereby moves for leave to file a memorandum of law in support of its forthcoming motion to dismiss the Complaint of up to and including thirty pages. Plaintiff City of Chicago (the “City”) has agreed to Glock, Inc.’s request for leave to file a memorandum of law of up to and including thirty pages, and Glock, Inc. has consented to the City having the same number of pages for its memorandum in opposition to Glock, Inc.’s motion to dismiss. In support thereof, Glock, Inc. and the City state as follows:

1. By Order entered on April 26, 2024, the Court extended the time for Glock, Inc. to respond to the City’s Complaint up to and including June 10, 2024.
2. The City’s Complaint consists of 118 paragraphs and asserts five causes of action against Glock, Inc. related to the illegal modification of Glock pistols by third parties to make those pistols fully automatic.

3. Glock, Inc. intends to move to dismiss the Complaint for failure to state a claim upon which relief can be granted. Glock, Inc. anticipates that its motion will raise a number of different issues.

4. In order to brief the issues fully, Glock, Inc. requests leave to file a memorandum of law that is up to and including thirty pages in length. In turn, Glock, Inc. has consented to the City filing a memorandum of law in opposition to Glock, Inc.'s motion that is also up to 30 pages in length.

WHEREFORE, Glock, Inc. and the City respectfully request that the Court grant each of them leave to file memoranda of up to thirty pages in length with respect to Glock, Inc.'s motion to dismiss the Complaint.

Dated: June 6, 2024

Respectfully submitted,

By: /s/ Michael L. Rice
Holly A. Harrison
Michael L. Rice
HARRISON LAW LLC
141 West Jackson Blvd., Suite 2055
Chicago, IL 60604
Telephone: 312-638-8781
Email: hollyharrison@hlawllc.com
mikerice@hlawllc.com

– and –

John F. Renzulli
Christopher Renzulli
Scott C. Allan
RENZULLI LAW FIRM, LLP
One North Broadway, Suite 1005
White Plains, New York 10601
Telephone: (914) 285-0700
Email: jrenzulli@renzullilaw.com
crenzulli@renzullilaw.com
sallan@renzullilaw.com

Attorneys for Glock, Inc.

MARY B. RICHARDSON-LOWRY
Corporation Counsel
of the City of Chicago

By: /s/ Chelsey B. Metcalf (w/permission)
CITY OF CHICAGO DEPT. OF LAW
Stephen J. Kane
Rebecca A. Hirsch
Chelsey B. Metcalf
121 North LaSalle Street, Room 600
Chicago, IL 60602
Telephone: (312) 744-6934
Email: stephen.kane@cityofchicago.org
rebecca.hirsch2@cityofchicago.org
chelsey.metcalf@cityofchicago.org

Attorneys for City of Chicago